

September 9, 2007

The Federal Communications Commission ("Commission") must provide adequate reimbursement rates to providers of Speech-to-Speech ("STS") relay service in order to comply with Section 225 of the Telecommunications Act. An economic incentive to providers is required for the intense, specific training of agents, and the outreach education necessary to tap an enormous pool of users who are basically left out unaware.

It is estimated that over ninety percent of potential STS users have no idea there is a service available for them to access the telephone network. This civil right – functional equivalency – is being restrained by low rates and limited outreach. I respectfully demand that the Commission act on behalf of my colleagues and friends whose lives are deeply and negatively affected by lack of adequate service – and knowledge of that service.

I, myself, am deaf and relay on relay in numerous forms to deal with my daily life and business. As a former co-author of an RFP for relay – one from which the Commission subsequently adopted nearly all quality of service standards – I am fairly knowledgeable regarding the various modes of communication that TRS entails.

The providers of STS are providing a valuable service but are unable to adequately reach out and inform the potential users due to the low rates. My state (Massachusetts) has an extremely low rate for STS and I pointed that out last week in filed comments to the Commonwealth of Massachusetts Department of Telecommunications and Cable (Verizon RFP# R0703826, DOCKET D.T.C. 07-04).

I strongly encourage the Commission to act swiftly and appropriately.

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